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September 29, 2015

VIA ECF AND E-MAIL

The Honorable Richard J. Sullivan
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Loreley Financing (Jersey) No. 3 Ltd., et al. v. Wells Fargo Securities, LLC, et al.*, No. 1:12-cv-03723 (RJS)

Dear Judge Sullivan:

I write on behalf of Plaintiffs and Defendants. The parties conducted a Rule 26(f) conference and are submitting the attached proposed Case Management Plan and Scheduling Order for the Court's consideration. The parties request a discovery conference to address the areas of disagreement set forth in Paragraphs 7(c), 7(d) and 8 of the Case Management Plan.

Separately, as noted in the parties' recent stipulation, Defendants will respond to the First Amended Complaint by October 20, 2015. To that end, on or before October 9, Defendants plan to file a pre-motion letter seeking leave to file a motion to dismiss the unjust enrichment and rescission claims alleged in that complaint. To further judicial efficiency, the parties are happy to also discuss that proposed motion at the requested case management conference.

We thank the Court for its consideration of the above request.

Respectfully submitted,



Sheron Korpus

cc: Counsel of record (via e-mail)